

165548



DMLIGH@solutia.com on 05/16/2000 03:18:25 PM

To: MICHAEL MCATEER
Subject: Saugat - Sediment Removal UAO - LDR issue

Mike,

As requested, Bruce will look at the broad scan sediment data tonight and compare it to the UTS limits. FYI - we took a quick look at TCDD. The sediment results exceed the LDR limit of 63 parts per trillion in Sectors C, D & E. We will have a more complete report tomorrow.

Based on the fact that the LDR issue may not be resolved quickly based on the absence of any UTS limit exceedances in Sectors C, D & E, consider the following. Based on your report, the Agencies are apparently in agreement now that conductance of the proposed Work in Sector B does not trigger the LDR issue. Therefore, perhaps we could get agreement to move forward on the UAO now if USEPA went back to the original concept of having the UAO cover only Sector B and Site M initially. The UAO could still require the construction of the same 50K CY cell currently envisioned - in the event that all parties later reach agreement on the inclusion of sediments from Sectors C, D & E. The UAO could then simply be modified to include Sectors C, D & E - after some of the tougher regulatory issues were addressed in the interim.

I will call tomorrow with the complete results of the quick analysis of the broad scan sediment data.

Mike Light

— dioxins & furans
exceed UTS
in C, D, E
all in C, D, E
no metals TCLP

TCDD	9000 ppt	UTS 1000 ppt
	45000 ppt	
	23,000 ppt	TCDF

m jfb